

1 KILPATRICK TOWNSEND & STOCKTON LLP
MEHRNAZ BOROUMAND SMITH (State Bar No. 197271)
2 RYAN BRICKER (State Bar No. 269100)
BYRON R. CHIN (State Bar No. 259846)
3 Two Embarcadero Center, Suite 1900
San Francisco, California 94111
4 Telephone: (415) 576-0200
Facsimile: (415) 576-0300
5 Email: mboroumand@kilpatricktownsend.com
rbricker@kilpatricktownsend.com
6 bchin@kilpatricktownsend.com

7 KILPATRICK TOWNSEND & STOCKTON LLP
MEGAN M. CHUNG (State Bar No. 232044)
8 ERWIN L. CENA (State Bar No. 272960)
12730 High Bluff Drive, Suite 400
9 San Diego, California 92130
Telephone: (858) 350-6100
10 Facsimile: (858) 350-6111
Email: mchung@kilpatricktownsend.com
11 ecena@kilpatricktownsend.com

12 Attorneys for Plaintiff
GOPRO, INC.

13
14 UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 GOPRO, INC., a Delaware corporation,
17 Plaintiff,
18 v.
19 360HEROS, INC., a Delaware corporation,
20 Defendant.

Case No. 16-cv-1944 (SI)

**PLAINTIFF GOPRO INC.'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

Date: November 3, 2017
Time: 9:00 a.m.
Ctmm: 1, 17th Floor
Hon. Susan Illston

Pursuant to Civil Local Rules 7-11(a), 79-5(d), and 79-5(e), and the Court’s Standing Order, Plaintiff GoPro, Inc., (“Plaintiff” or “GoPro”) respectfully moves the Court for administrative relief to file under seal documents designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Defendant 360Heros, Inc. (“Defendant” or “360Heros”) or by GoPro (collectively, “the Requested Sealed Documents”).

GoPro’s Reply in Support of its Motion for Summary Judgment references materials that 360Heros has designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” information. Under the Protective Order entered by this Court on June 26, 2017 (Dkt. 73, “the Protective Order”), GoPro is required to file these documents under seal. For these materials, GoPro relies on 360Heros’ designations to support its Administrative Motion to File Documents Under Seal. GoPro’s request is narrowly tailored to seal only portions of these documents that reference 360Heros’ confidential material:

Document	Portions Sought to be Sealed
Plaintiff GoPro, Inc.’s Reply in Support of Motion for Summary Judgment	Portions of document appearing on page 7.

This Motion is supported by the Declaration of Byron R. Chin and a [Proposed] Order. Pursuant to Civil Local Rules 79-5(d) and 79-5(e), GoPro lodges the Requested Sealed Documents with this Court, and respectfully requests leave to file these documents under seal.

A Proposed Order is being filed concurrently with this motion for the Court’s convenience.

DATED: October 13, 2017

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By /s/ Mehrnaz Boroumand Smith
MEHRNAZ BOROUMAND SMITH

Attorneys for Plaintiff
GOPRO, INC